



U.S. Department of Justice

*United States Attorney
Eastern District of New York*

JMH
F.#2017R00906

*271 Cadman Plaza East
Brooklyn, New York 11201*

August 5, 2021

By ECF

The Honorable Pamela K. Chen
United States District Judge
Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201

Re: United States v. Hu Ji, et al.
Criminal Docket No. 21-265 (PKC)

Dear Judge Chen:

On June 18, 2021, the Court entered a Stipulation and Order concerning unclassified sensitive discovery material in the above-referenced case as to defendants Michael McMahon, Yong Zhu, and Congying Zheng. See ECF No. 70 (“the Protective Order”). Following entry of the Protective Order, defendant Zebin Kuang has appeared in this case. Defendant Kuang, by counsel, has agreed to the terms of the Protective Order, as indicated in the enclosed. Accordingly, the government respectfully requests that the Court so-order the enclosed as to defendant Kuang.

Respectfully submitted,

JACQUELYN M. KASULIS
Acting United States Attorney

By: /s/
J. Matthew Haggans
Assistant U.S. Attorney
(718) 254-7000

Enclosure

cc: Clerk of the Court (PKC) (by ECF)
All counsel of record (by ECF)